

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AUGUSTIN SAJOUS, *on behalf of himself*
and all others similarly situated,

Plaintiffs,

v.

THOMAS DECKER, in his official capacity
as New York Field Office Director for U.S.
Immigration and Customs Enforcement, *et.*
al.,

Defendants

and

IMMIGRATION LAW REFORM
INSTITUTE,

Movant.

Civil Action No. 1:18-cv-2447-AJN

**NOTICE OF MOTION AND MOTION FOR LIMITED-PURPOSE
INTERVENTION TO UNSEAL RECORD**

PLEASE TAKE NOTICE that Immigration Law Reform Institute (“IRLI”) will move this Court on a return date to be determined by the Court, or as soon thereafter as counsel may be heard, for an order to unseal the record of the above-captioned action pursuant to the common law right of access to government documents and the First Amendment, along with such other and further relief as this Court deems just and proper.

In support of this motion, IRLI files the attached memorandum of law, the declarations of Lawrence J. Joseph and Christopher J. Hajec, a proposed Order, a proposed conditional Show-Cause Order, a responsive pleading pursuant to FED. R. CIV. P. 24(c), and a disclosure pursuant to FED. R. CIV. P. 7.1. If the plaintiff-petitioner or federal defendants-respondents oppose this motion, IRLI intends to file and serve reply papers. (IRLI sought the parties’ position on unsealing the record in advance of moving this Court, but the parties’ counsel did not respond to that inquiry.)

WHEREFORE, for the reasons stated herein and in the accompanying memorandum, IRLI respectfully requests leave to intervene in this action for the limited purpose of seeking to unseal the record. With respect to the record, IRLI respectfully requests that the Court either: (a) order the immediate unsealing of the entire record herein or, alternatively, (b) issue a show-cause order directing the affected parties to justify the record's remaining partially sealed.

Dated: August 9, 2018

Respectfully submitted,

/s/ Lawrence J. Joseph

Lawrence J. Joseph, D.C. Bar No. 464777
admitted *pro hac vice*

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Counsel for Movant

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of August, 2018, I electronically filed the foregoing motion (together with its accompanying memorandum of law, exhibits, proposed order and show-cause order, answer, and the certificate required by Fed. R. Civ. P. 7.1) with the Clerk of the Court using the CM/ECF system, thereby causing it to be served upon all counsel of record.

/s/ Lawrence J. Joseph

Lawrence J. Joseph, D.C. Bar No. 464777
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